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17 *Swift Transportation Co. of Arizona, LLC*

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 LAURA PETERS,

21 Plaintiff,

22 v.

23 SWIFT TRANSPORTATION CO. OF
24 ARIZONA, LLC; DOE DRIVER; DOES I
25 through XX, inclusive; and ROE BUSINESS
26 ENTITIES I through XX, inclusive,

27 Defendants.

Case No. 2:19-cv-00874-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(FIRST REQUEST)

28 Defendant Swift Transportation Co. of Arizona, LLC (“Swift”) and Plaintiff Laura Peters (“Ms. Peters” or “Plaintiff”), by and through their respective undersigned counsel, hereby stipulate and agree to extend the current dispositive motion deadline set forth in the Scheduling Order entered on June 16, 2022 (ECF No. 72) pursuant to LR 26-3. This is the first stipulation to specifically extend the dispositive motion deadline.

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A. Statement Specifying the Discovery Completed

The parties have substantially completed all discovery in this matter, including disclosing thousands of pages of records, serving and responding to Rule 34 vehicle inspection requests, three medical examinations of Ms. Peters arranged by Swift, expert disclosures, and dozens of depositions of lay witnesses, treating providers, and expert witnesses.

B. Specific Description of the Discovery that Remains to be Completed

The parties have agreed to allow Swift to take three additional depositions of Valerie Tucker, Bonnie Clear, and a follow-up deposition of Plaintiff. The parties will also supplement discovery as permitted by law.

C. Reasons Why Additional Time is Needed for the Dispositive Motion Deadline

The current dispositive motion deadline is August 29, 2022. The parties submit that good cause exists to extend this deadline by three weeks to allow the follow-up deposition of Plaintiff to take place prior to the deadline (the depositions had to be rescheduled through the mutual agreement of the parties given Covid-19 concerns for counsel, among other significant scheduling concerns, including trial) and to allow the parties to engage in further good-faith discussions in an effort to negate the need for a dispositive motion on certain issues, if not entirely.

D. Proposed Schedule

Event	Current Deadline (ECF No. 72)	Proposed Deadline
Discovery Cutoff	Passed	Passed
Deadline Amend Pleadings/Add Parties	Passed	Passed
Initial Expert Disclosure	Passed	Passed
Rebuttal Expert Disclosure	Passed	Passed
Dispositive Motions	08/29/2022	09/19/2022
Pretrial Order	30 days after the dispositive motion deadline unless dispositive motions are pending, in which case, the deadline would be 60 days after the order on the dispositive motion(s) is issued.	Same

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If dispositive motions are filed, the deadline for filing the pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the pretrial order.

DATED: August 25, 2022

DATED: August 25, 2022

/s/ Ryan T. Gormley

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/s/ Ramzy Ladah (with permission)

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IT IS SO ORDERED.

Dated this 25 day of August, 2022.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

